

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICHOLAS M. MARTIN,)	
)	Case No. 1:16-cv-09483
Plaintiff,)	
)	
v.)	Honorable John J. Tharp, Jr.
)	
WELLS FARGO BANK, N.A.,)	Magistrate Judge Sheila M. Finnegan
)	
Defendant.)	
)	

**AGREED MOTION TO EXTEND DATE TO
FILE MOTION FOR PRELIMINARY APPROVAL BY 5 DAYS**

Plaintiff Nicholas Martin respectfully request that the Court extend the date for him to file his motion for preliminary approval by five days from December 1, 2017 to December 6, 2017. In support of this motion, Plaintiff states as follows:

1. On October 11, 2017 the parties filed a joint motion to stay the case and advised the Court that the October 5, 2017, mediation resulted in a settlement in principle to resolve this case on a class-wide basis. Dkt. 90.

2. The parties requested the Court set December 1, 2017 as the deadline by which plaintiff shall file a motion for preliminary approval of the parties' settlement, and set December 12, 2017 as the deadline to present the motion. *Id.*

3. This Court granted the parties' motion and set December 1, 2017 as the deadline for Plaintiff to file a motion for preliminary approval. Dkt. 92.

4. The parties have worked diligently over the past several weeks to agree on the terms of the settlement agreement, but they need a few additional days—until December 6, 2017—to select a settlement administrator, finalize the agreement (which is to be filed with the

motion for preliminary approval), and obtain signatures.

5. Plaintiff will still notice the motion for presentment on December 12, 2017.

6. No party will be prejudiced by allowance of this motion and Wells Fargo has agreed to the requested extension.

WHEREFORE, Plaintiff respectfully requests that the Court extend the date for him to file his motion for preliminary approval by five days from December 1, 2017 to December 6, 2017.

Respectfully Submitted,

/s/Keith J. Keogh

Keith J. Keogh

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